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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

ROBERT GEORGE BEANE,

Defendant.

No. 2:23-mj-0877-DJA

Stipulation and Protective Order

The United States, by and between Jason M. Frierson, United States Attorney, and Mina Chang, Assistant United States Attorney, counsel for the United States of America, and Rene L. Valladares, Federal Public Defender, and Brian Pugh, Assistant Federal Public Defender, counsel for Defendant Robert George Beane, respectfully move for the entry of a Protective Order governing discovery in this matter in accord with the following Stipulation:

STIPULATION

Whereas, the parties recognize that various federal and state laws and regulations extend protections and limitations regarding the use, disclosure, or publication of information associated with the privacy and identity of an individual, including, but not limited to, social security number, date of birth, address, telephone number, driver's license

1 number, financial information, banking information, and tax information, which is
2 hereinafter collectively referred to as “Protected Personal Information” (“PPI”);

3 Whereas, the parties recognize that discovery in the above-captioned case is likely to
4 be voluminous and may include documents and other evidence containing PPI of third
5 parties;

6 Whereas, the parties desire to provide for the timely and expeditious exchange of
7 discovery while simultaneously guarding against the inappropriate use, disclosure, or
8 publication of any PPI associated with any party or third party;

9 Whereas, in light of the above, the parties have conferred on this matter and have
10 reached agreement on the exchange and handling of PPI;

11 IT IS HEREBY STIPULATED AND AGREED by and between the undersigned
12 parties, as follows:

- 13 1. Documents containing PPI will be referred to as “Protected Documents.”
- 14 2. The government may produce Protected Documents to the defendant in
15 discovery without redacting PPI.
- 16 3. Access to Protected Documents produced by the government will be
17 restricted to the defendants, attorneys for the defendants, and any agents,
18 contractors, or employees acting on behalf of the defendants and/or their
19 attorneys in connection with the above-captioned matter (hereinafter
20 referred to collectively as “Authorized Person(s)").
- 21 4. Unless otherwise Ordered by the Court, an Authorized Person shall not:
22 a. grant or permit access to Protected Documents by any non-
23 Authorized Person.

- b. allow or permit any non-Authorized Person to read, review, or reproduce any Protected Document.
- c. distribute any Protected Document, by any means, to any non-Authorized Person.
- d. use or disclose Protected Documents, and any PPI contained therein, for any purpose other than in connection with the defense of the above-captioned matter.
- e. use or disclose a Protected Document in connection with any pleadings or proceedings in the above-captioned matter without first redacting any PPI, unless the PPI is directly relevant to the matter at issue.
- f. use or disclose PPI in connection with any pleadings or proceedings in the above-captioned matter, unless the PPI is directly relevant to the matter at issue.

5. Upon conclusion of the above-captioned matter, each defendant's attorney shall return any and all copies of Protected Documents to the attorneys for the United States, or provide them with written certification that the Protected Documents have been destroyed.

6. Nothing in the agreement shall be deemed an admission of the evidentiary admissibility or inadmissibility of any Protected Document in any subsequent proceeding.

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WHEREFORE, the undersigned respectfully request that the Court accept and enter this Stipulation as the Protective Order governing discovery in this case.

DATED this 5th day of June, 2024.

Respectfully submitted,

RENE L. VALLADARES
Federal Public Defender

JASON M. FRIERSON
United States Attorney

/s/ Brian Pugh
BRIAN PUGH, AFPD
Assistant Federal Public Defender
Counsel for Defendant Beane

/s/ Mina Chang
MINA CHANG
Assistant United States Attorney
Counsel for the United States

IT IS SO ORDERED:

DATED: 6/10/2024


HONORABLE DANIEL J. ALBREGTS
UNITED STATES MAGISTRATE JUDGE